

EXHIBIT 1

Request No. 2:

Formal job descriptions for each job held at any retail store location in the State of New York at any time during the relevant time period.

Response to Request No. 2:

Defendant objects to this Request on the grounds that it is vague and ambiguous and overly broad to the extent it seeks “job descriptions for each job held at any retail store location in the State of New York at any time during the relevant time period” without specifying the specific job positions relevant to the instant matter. This Request is also vague and ambiguous because it is not clear to whom it is referring when it states “each job held.” This Request is overly burdensome because it is disproportionately seeks discovery that would require an unreasonable amount of time and expense to fulfill as compared to the relevance and importance of those documents responsive to the request. Defendant is not withholding any documents responsive to this request.